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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG 07 2024

SEAN F. McAVOY, CLERK
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6 UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 AARON DANIEL AUNG,
JAIMES TIN AUNG, and
12 NADIA ERIKA COLE,

13 Defendants.

INDICTMENT 2:24-CR-106-TOR

Vio.: 18 U.S.C. § 371
Conspiracy to Commit
International Parental
Kidnapping
(Count 1)

18 U.S.C. §§ 1204, 2
International Parental
Kidnapping
(Count 2)

16 The Grand Jury charges:

17 COUNT 1

18 On or about May 2024 and continuing until on or about July 7, 2024, in the
19 Eastern District of Washington, and elsewhere, including Mexico, the Defendants
20 AARON DANIEL AUNG, JAIMES TIN AUNG, and NADIA ERIKA COLE,

21 INDICTMENT – 1

1 knowingly combined, conspired, confederated, and agreed to commit an offense
2 against the laws of the United States, that is, international parenting kidnapping, in
3 violation of 18 U.S.C. §1204, all in violation of 18 U.S.C. § 371.

4 OVERT ACTS

5 In furtherance of the conspiracy and to effect the object, the conspirators
6 committed numerous over acts in the Eastern District of Washington and
7 elsewhere, including the following:

- 8 1. On or about May 29, 2024, AARON DANIEL AUNG conducted a custody
9 exchange of Minor Victim, with Minor Victim's mother, Samara Harmon, at
10 the Pullman, Washington police station.
- 11 2. On or about May 29, 2024, AARON DANIEL AUNG retrieved a Cadillac
12 registered to JAIMES TIN AUNG, from a storage unit at Inland Boat and
13 RV Storage, in Athol, Idaho.
- 14 3. On or about May 29, 2024, NADIA ERIKA COLE left the Seattle-Tacoma
15 International airport, where she had checked in for a scheduled flight, to
16 meet AARON DANIEL AUNG and Minor Victim and travel to Mexico.
- 17 4. On or about May 30, 2024, AARON DANIEL AUNG traveled with Minor
18 Victim through the Eastern District of Washington, into the Western District
19 of Washington, where he met up with NADIA ERIKA COLE at a
20 predesignated location, in Tacoma, Washington.

1 5. On or about June 1, 2024, AARON DANIEL AUNG and NADIA ERIKA
2 COLE crossed the border to Mexico with Minor Victim.

3 6. On or about June 3, 2024, AARON DANIEL AUNG failed to return Minor
4 Victim to Minor Victim's lawful parent Samara Harmon, at the designated
5 location in Pullman, Washington, pursuant to the parenting plan then in
6 place.

7 7. On or about May 31, 2024, through June 16, 2024, JAIMES TIN AUNG
8 assisted AARON DANIEL AUNG in avoiding law enforcement detection
9 by exchanging coded/encrypted messages and warning AARON DANIEL
10 AUNG about the ongoing investigation and how to avoid detection.

11 8. On or about June 1, 2024, until July 4, 2024, AARON DANIEL AUNG and
12 NADIA ERIKA COLE remained in Mexico with Minor Victim, contrary to
13 Samara Harmon's parental rights.

14 COUNT 2

15 On or about June 1 through July 7, 2024 in the Eastern District of
16 Washington and elsewhere, including Mexico, the Defendants AARON DANIEL
17 AUNG, JAIMES TIN AUNG, and NADIA ERIKA COLE did remove Minor
18 Victim from the United States and retain Minor Victim outside of the United States
19 with the intent to obstruct the lawful exercise of another person's parental rights,
20 and did aid and abet the same, in violation of 18 U.S.C. §§ 1204, 2.

1 DATED this 7th day of August 2024.

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4 *Vanessa Waldref*

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6 United States Attorney

7 *Rebecca R. Perez*

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9 Assistant United States Attorney

10 *Michael J. Ellis for*

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